

08/05/22	\$1,192.85	06/01/22	\$1,192.85		\$1,022.28
08/26/22	\$1,192.85	07/01/22	\$1,192.85		\$1,022.28
09/30/22	\$1,192.85	08/01/22	\$1,192.85		\$1,022.28
10/31/22	\$1,192.85	09/01/22	\$1,192.85		\$1,022.28
12/01/22	\$1,192.85	10/01/22	\$1,192.85		\$1,022.28
01/05/23	\$1,192.85	11/01/22	\$1,192.85		\$1,022.28
02/03/23	\$1,192.85	12/01/22	\$1,192.85		\$1,022.28
03/02/23	\$1,245.15	01/01/23	\$1,192.85		\$1,074.58
03/31/23	\$1,245.15	02/01/23	\$1,245.15		\$1,074.58
05/01/23	\$1,245.15	03/01/23	\$1,245.15		\$1,074.58
06/01/23	\$1,245.15	04/01/23	\$1,245.15		\$1,074.58
06/30/23	\$1,245.15	05/01/23	\$1,245.15		\$1,074.58
08/02/23	\$1,245.15	06/01/23	\$1,245.15		\$1,074.58
08/31/23	\$1,245.15	07/01/23	\$1,245.15		\$1,074.58
10/04/23	\$1,245.15	08/01/23	\$1,245.15		\$1,074.58
11/09/23	\$1,245.15	09/01/23	\$1,245.15		\$1,074.58
12/08/23	\$1,245.15	10/01/23	\$1,245.15		\$1,074.58
01/08/24	\$1,245.15	11/01/23	\$1,245.15		\$1,074.58
02/07/24	\$1,245.15	12/01/23	\$1,245.15		\$1,074.58
03/12/24	\$1,020.70	01/01/24	\$1,245.15		\$850.13
04/08/24	\$1,020.70	02/01/24	\$1,020.70		\$850.13
05/14/24	\$1,020.70	03/01/24	\$1,020.70		\$850.13
06/04/24	\$1,020.70	04/01/24	\$1,020.70		\$850.13
07/01/24	\$1,020.70	05/01/24	\$1,020.70		\$850.13
08/05/24	\$1,020.70	06/01/24	\$1,020.70		\$850.13
09/03/24	\$274.45	07/01/24	\$1,020.70		\$103.88
					\$103.88

ROMANO GARUBO & ARGENTIERI

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April 18, 2024

Via: Regular U.S. Mail
Theodore A. Green
923 Jackson Street
Sharon Hill, PA 19079

Via: Regular U.S. Mail & Email
Erik B. Jensen
Jensen Bagnato, PC
1500 Walnut Street
Suite 1510
Philadelphia, PA 19102

RE: Theodore A. Green
CHAPTER 13 BANKRUPTCY
CASE NO. 20-12303-AMC
Default of 04/13/2022 Stipulation Resolving Motion for Relief

Dear Mr. Green and Mr. Jensen:

As you may be aware, this law firm represents the interests of J.P. Morgan Mortgage Acquisition Corp. (hereinafter "J.P. Morgan") in the above-captioned matter. As you are further aware, you executed a Note and Mortgage against the above-referenced property.

Undersigned filed a motion for relief from the automatic stay on behalf of J.P. Morgan as to the Jackson Street property. As a result of said motion, you agreed to enter into a stipulation settling the motion, which was entered and approved by the Court on April 13, 2022. In said stipulation, you agreed that all post-petition mortgage arrearages were to be cured and all future post-petition payments were to be remitted timely for the remaining life of your Chapter 13 bankruptcy case.

This letter shall serve as formal written notice that you have defaulted under the terms of the aforementioned stipulation order. The post-petition account remains due for the February 1, 2024 through April 1, 2024 payments.

Page two

April 18, 2024

J.P. Morgan hereby demands that you bring all past due payments current within ten (10) days from the date of this letter. If you fail to comply in accordance with the terms of this letter, J.P. Morgan will file a certification of default as to the aforesaid Stipulation Resolving Relief Motion and request that the Court grant J.P. Morgan an order modifying the automatic stay, to permit J.P. Morgan to proceed with its State Law rights as to the aforementioned property.

Please guide yourself accordingly.

Very truly yours,
Romano Garubo & Argentieri

/S/EMMANUEL J. ARGENTIERI

Emmanuel J. Argentieri

bk@rgalegal.com

EJA/ksj

Enclosures – post-petition payment history & Order/stip

[illegible]

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)**

In Re:
Theodore A. Green

XXX-XX-6464

Debtor.

:CHAPTER 13
:CASE NO. 20-12303-AMC

**J.P. MORGAN MORTGAGE ACQUISITION
CORP.**

Movant,

v.

THEODORE A. GREEN

Debtor,

And

SCOTT F. WATERMAN, ESQUIRE
Trustee,

Respondents.

:Hearing Date: February 23, 2022 @ 11:00 a.m.

:Court room #4

STIPULATION RESOLVING RELIEF MOTION

THIS matter being opened to the Court by Emmanuel J. Argentieri, Esquire of the law office of Romano Garubo & Argentieri, counsel for the secured creditor, J.P. Morgan Mortgage Acquisition Corp., (hereinafter “Movant”), upon a motion for relief from the automatic stay as to real property, more commonly known as 923 Jackson Street, Sharon Hill, Pennsylvania 19079; and it appearing that the parties have amicably resolved their differences and for good cause shown;

1. Debtor's post-petition mortgage account is currently due for the December 1, 2021 through January 1, 2022 post-petition monthly mortgage payments at \$1,022.28 each, along with the reimbursement of Movant's attorney fees/costs in the amount of \$1,050.00 for a grand total of \$3,094.56.

2. The aforesaid amount (\$3,094.56) shall be rolled into Debtor's Chapter 13 plan as a secured claim and shall be paid to Movant over the remaining term of Debtor's plan.

3. The Chapter 13 Trustee shall adjust his records to reflect the increased amount due to Movant pursuant to this order and pay said increased claim to Movant in normal course. Additionally, Debtor shall file a Motion to Modify the Plan within 30 days of Court approval of this stipulation to reflect the changes in the plan pursuant to this stipulation.

4. Within 30 days from the entry of this Stipulation, Debtor shall file a proof of claim on behalf of Movant for the amount set in paragraph 2 herein pursuant to this stipulation.

5. Commencing with the February 1, 2022 post-petition mortgage payment and continuing each month thereafter for the duration of this Chapter 13 proceeding, Debtor shall remit payments directly to Movant as same come due.

6. If any regular monthly mortgage payments commencing after the cure of the post-petition delinquency are more than thirty (30) days late, Movant may send Debtor a written notice of default of this Stipulation. If the default is not cured within ten (10) days of the date of the notice, counsel for the Movant may file a Certification of Default with the

Court and the Court shall enter an Order granting Movant relief from the automatic stay as to the mortgaged property referenced herein.

The undersigned hereby consent to the form and entry of the within order.

/S/EMMANUEL J. ARGENTIERI
Emmanuel J. Argentieri, Esquire
Attorney for Movant

Date: 3/24/2022

/S/ERIK B. JENSEN
Erik B. Jensen, Esquire
Attorney for Debtor

Date: 4/6/2022

/S/ANN E. SWARTZ
Ann E. Swartz, Esquire
For: Scott F. Waterman
Ch. 13 Trustee

Date: 4/5/2022

AND NOW, this _____ day of _____, 2022, it is hereby ORDERED
that the foregoing Stipulation is approved, shall be, and is made an Order of this Court.



Date: April 13, 2022

Honorable Ashely M. Chan
U.S. Bankruptcy Judge
Eastern District of Pennsylvania

This stipulation consists of three (3) pages

Kristina Johnston

From: Kristina Johnston
Sent: Tuesday, April 30, 2024 11:00 AM
To: 'erik@jensenbagnatolaw.com'
Subject: 20-12303-AMC Theodore Green
Attachments: NOD.pdf

Attorney Jensen,

Please see attached.

Respectfully,

Kristina Johnston

Paralegal
Romano Garubo & Argentieri
Counselors at Law, LLC
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